

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION**

ERICA LAYTON, ET AL.

v.

CHEVRON ENVIRONMENTAL
MANAGEMENT CO., ET AL.

CIVIL ACTION NO. 13-1634

JUDGE S. MAURICE HICKS, JR.

MAGISTRATE JUDGE HORNSBY

JOINT MOTION FOR DISMISSAL

NOW INTO COURT, through undersigned counsel, come plaintiffs, Erica Layton, Gerald Buntyn, Jr., and Samuel Layton (collectively “Plaintiffs”), and defendants, Chevron Environmental Management Co. and Conestoga-Rovers & Associates, Inc. (collectively “Defendants”). Plaintiffs and Defendants jointly submit to the Court that all remaining claims in this lawsuit have been resolved by settlement and, accordingly, respectfully request that the Court dismiss all claims against Defendants with prejudice, each party to bear its own respective costs.

Respectfully submitted by:

VERON, BICE, PALERMO & WILSON, L.L.C.

/s/ J. Rock Palermo III

J. Rock Palermo III (La. Bar #21793)
Turner D. Brumby (T.A.) (La. Bar #33519)
721 Kirby Street, 70601
P. O. Box 2125
Lake Charles, LA 70602-2125
Telephone: (337) 310-1600
Facsimile: (337) 310-1601
rock@veronbice.com
turner@veronbice.com

Counsel for Plaintiffs
Erica Layton, Samuel Layton and
Gerald Buntyn, Jr.

KEAN MILLER LLP

/s/Brittany B. Salup

Michael R. Phillips, T.A. (La. Bar # 21020)
Brittany B. Salup (La. Bar # 33042)
909 Poydras Street, Suite 3600
New Orleans, Louisiana 70112
Telephone: (504) 585-3050
Facsimile: (504) 585-3051
mike.phillips@keanmiller.com
brittany.salup@keanmiller.com

Counsel for Chevron Environmental
Management Company

- and -

KEAN MILLER LLP

/s/ Scott L. Zimmer

Scott L. Zimmer (La. Bar #26151)

333 Texas Street, Suite 450

Shreveport, Louisiana 71101

Telephone: (318) 562-2655

Facsimile: (318) 562-2751

scott.zimmer@keanmiller.com

Counsel for Conestoga-Rovers & Associates, Inc.

LOCAL RULE 5.7.08W CERTIFICATE

Pursuant to Local Rule 5.7.08W, the filing attorney certifies that the other signatory has expressly agreed to the form and substance of the document and that the filing attorney has the signatory's actual authority to submit the document electronically, using his electronic signature.

New Orleans, Louisiana, this _____ day of September, 2014.

/s/Brittany B. Salup

CERTIFICATE OF SERVICE

I hereby certify that, on this _____ day of September, 2014, I have filed a copy of the foregoing pleading with the United States District Court for the Western District of Louisiana's electronic filing and case management system (CM/ECF), which automatically sends an electronic copy of the pleading to all enrolled counsel of record. I further certify that I have provided a copy of the pleading by email and/or by placing a copy of the same in the U.S. mail, properly addressed and with postage pre-paid, to any known counsel of record who are not enrolled in the Court's CM/ECF system.

/s/Brittany B. Salup